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10 *Attorneys for Plaintiff*
Fiona Harvey

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA

14 FIONA HARVEY,
15
16 Plaintiff,

17 v.

18 NETFLIX, INC. and NETFLIX
19 WORLDWIDE ENTERTAINMENT,
LLC,
20 Defendants.

Case No. 2:24-cv-04744-RGK-AJR

**DECLARATION OF JOHN HALA IN
SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANTS'
SPECIAL MOTION TO STRIKE**

Place: Roybal Federal Building and U.S.
Courthouse, 255 East Temple Street, Los
Angeles, CA 90012, Courtroom 850

Judge: The Hon. R. Gary Klausner

1 I, JON HALA, hereby declare and state as follows:

2 1. I reside in London, United Kingdom.

3 2. I am a professional hair stylist and have been so since 1991.

4
5 Approximately five years ago, I opened up my own hair salon which currently has
6 a staff of approximately sixteen individuals.
7

8 3. I have known Fiona Harvey just under seven years, when I was
9 introduced to her just by a colleague and became her hair stylist. When I started
10 my own salon, Fiona came with me and continues to be a frequent customer.
11

12 4. In April 2024, my wife and I watched *Baby Reindeer* on Netflix. I
13 understood, as represented very early in the first episode, that the series was a “true
14 story.” After completing the first episode, I turned to her and said “that’s Fiona
15 Harvey, my customer.”
16

17 5. That conclusion was very obvious for many reasons. Fiona, like
18 Martha in the series, is a strong and spicey Scottish woman who used to live in
19 Camden. Martha looks like her. Martha sounds like her. Martha dresses like her.
20 Martha is an attorney, like Fiona Harvey. Martha is very bright and, at times,
21 extremely funny and endearing, like Fiona Harvey. Martha, also like Fiona
22 Harvey, is a highly stressful individual who does have emotional issues, another
23 aspect of Martha captured in the series.
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1 6. There is more. Martha, like Fiona Harvey, is Scottish with a strong
2 Scottish accent. Martha is the same age. Martha has the same cadence and, like
3 Fiona Harvey, is overweight with the same physical appearance as Fiona. Martha
4 even dresses like Fiona, as they both wear big, baggy dresses. She even wears her
5 watch tightly strapped on her large wrist, as Fiona does.
6

7
8 7. Indeed, I was very impressed how well Richard Gadd, the writer and
9 actor in the series, was able to make Martha appear to be Fiona in every way. He
10 even has her drinking tea, which Fiona does every time she comes into my salon.
11
12 All of those characteristics are remarkably identical.

13 8. Gadd even depicts her standard of living and the food she eats. While
14 I have never visited the flat, I do know that, like Martha, Fiona Harvey regularly
15 eats pre-packed, ready-made microwave food. I know that because we talk about it
16 when she comes to the salon and, often times, either before or after her hair
17 appointment, she will tell me she is going to buy that type of food. And in the
18 series there is a scene that shows her kitchen with those same foods.
19
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21 9. Having seen the series, I decided not to tell Fiona about it as I did not
22 want to upset her. I also know that Fiona Harvey is a diabetic and that individuals
23 suffering from diabetes can have difficult moments, depending on their sugar
24 intake, so I intentionally did not want to tell her about the series but wondered if
25 she was aware of *Baby Reindeer* and how Gadd and Netflix produced a show about
26 her.
27
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1 10. Sometime in April 2024, after I had already seen the series, Fiona
2 Harvey came in for a hair appointment. She was very upset and afraid and told me
3 there was a series about her. I did not tell her that I had seen it as I did not want to
4 upset her.
5

6 11. I did not closely follow the story but became aware that numerous
7 news outlets, including the Daily Mail and Daily Record in Scotland, were
8 following the story. I also became aware that numerous individuals of my staff
9 followed the story which was all over Instagram and Facebook. They were very
10 much aware of and on top of the situation. I simply did not do so, as I do not have
11 time in the day to spend on those social media apps.
12
13

14 12. As Fiona continued to come in for her hair on occasion, she was very
15 concerned about people recognizing her as I understand the social media sites were
16 filled with negative comments about Fiona Harvey. I became concerned for her
17 health and wellbeing.
18
19

20 13. I was also generally familiar with Richard Gadd before the Netflix
21 series. He had a small following as a terrible comedian.
22

23 14. The more I watched the episodes the more confident I was that Martha
24 is Fiona Harvey. There is no doubt. Indeed, my entire staff and I have watched
25 the series and recognized that it is about Fiona Harvey. At the salon, we all talk
26 about how closely Gadd depicted Fiona Harvey as Martha.
27
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1 I declare under penalty of perjury under the laws of the United States of
2 America that the foregoing is true and correct to the best of my knowledge,
3 information and belief.

4 Executed this 19th day of August, 2024 in London, England.

5 By: Jon Hala

6 Jon Hala
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